

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

AMARILIS COLLADO, as Administratrix of the
Estate of her husband JOHN COLLADO, SR.,

Plaintiff,

-against-

THE CITY OF NEW YORK, New York City
Police Department (“NYPD”) Detective JAMES
CONNOLLY, Shield #4292,

Defendants.

No. 11 Civ. 9041 (DC)

**DECLARATION OF
PATRICK J. BRACKLEY, ESQ.**

PATRICK J. BRACKLEY, an attorney admitted to practice in the State of New York, declares under penalty of perjury as follows:

1. I submit this Declaration in support of Plaintiff Amarilis Collado’s request that the Court sign an Order of Compromise approving the settlement and the proposed attorneys’ fees and costs.

2. I represented Ms. Collado from September 2011 until approximately April 2012, when she retained her current counsel, Emery Celli Brinckerhoff & Abady LLP (“ECBA”). My participation began within two hours of Mr. Collado being shot. In fact, I was present at the hospital the very same night he was shot. After Mr. Collado passed away, I interviewed material witnesses both at the scene and elsewhere with the help of Spanish speaking investigators. I sought and obtained potential video evidence, and hired forensic investigators to analyze and review it. I aided and assisted Plaintiff and her family in their interactions with the New York County District Attorney’s office. I represented Plaintiff at her 50-h hearing. And I prepared and filed the initial complaint in this case.

3. On August 10, 2012, the Court granted me a charging lien on this case.

See Dkt. 7.

4. In full satisfaction of that lien, I am seeking to recover \$31,300 in fees for the approximately 67 hours of work I did between September 2011 and April 2012, and \$28,627.89 in costs, for a total of \$59,927.89.

5. My agreement with Ms. Collado provided that I would advance all costs and expenses associated with the case and that I would be reimbursed for those costs from Plaintiff's portion of any recovery.

6. I incurred expenses of \$28,627.89 in connection with this case. In addition to filing fees and photocopies, the costs arose from fees paid to investigators who helped me interview witnesses and forensic consultants who analyzed potential video evidence for me.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: October 18, 2019


PATRICK J. BRACKLEY